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Attorneys for Plaintiff/Counter Defendant
TESLA, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TESLA, INC.,
Plaintiff,

v.

MARTIN TRIPP,
Defendant.

Case No. 3:18-cv-00296-LRH-CBC

**SUPPLEMENTAL DECLARATION OF
JEANINE ZALDUENDO IN SUPPORT
OF TESLA'S EMERGENCY MOTION
FOR ORDER TO SHOW CAUSE AND
HEARING**

AND RELATED COUNTERCLAIMS

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1 **I, Jeanine Zalduendo, declare as follows:**

2 1. I am a member of the bar of the State of California and an associate at Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Plaintiff and Counterclaim Defendant Tesla,
4 Inc. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness,
5 I could and would testify competently thereto.

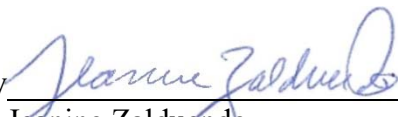
6 2. I submit this supplemental declaration in support of Tesla's Reply in support of its
7 Emergency Motion for Order to Show Cause and Hearing ("Emergency Motion").

8 3. Attached hereto as **Exhibit 19** is a true and correct copy of an October 12, 2020
9 email from Mr. Tripp to myself and other Tesla counsel.

10 4. Attached hereto as **Exhibit 20** is a true and correct compilation of communications
11 showing Tripp's harassment of current and former Tesla employees, including: an October 14,
12 2020 tweet by Mr. Tripp, publishing a link to his "Key Players" post on his website; an excerpt of
13 the "Key Players" post on Mr. Tripp's website, available at [https://tesla-](https://tesla-fraud.ch/index.php/2020/10/11/key-players/)
14 [fraud.ch/index.php/2020/10/11/key-players/](https://tesla-fraud.ch/index.php/2020/10/11/key-players/); an October 12, 2020 email from Mr. Tripp to current
15 and former Tesla employees; an October 12, 2020 message Mr. Tripp sent to a current Tesla
16 employee via LinkedIn; and an October 12, 2020 message sent from Mr. Tripp to the employer of
17 a former Tesla employee via LinkedIn.

18
19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct and that this document was executed in Los Angeles, California.

21 DATED: October 16, 2020

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23 By 
24 Jeanine Zalduendo
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the October 16, 2020, a true and correct copy of the foregoing **SUPPLEMENTAL DECLARATION OF JEANINE ZALDUENDO IN SUPPORT OF TESLA'S EMERGENCY MOTION FOR ORDER TO SHOW CAUSE AND HEARING** was emailed and served via FED EX delivery to the following:

Martin Tripp
Bocskai Utca 11/A
Cece 7013
Hungary
mtprotons@protonmail.com

Pro Se Defendant/Counterclaimant

/s/ CaraMia Gerard
An employee of McDonald Carano LLP